

CAMPBELL CAMPBELL EDWARDS & CONROY  
PROFESSIONAL CORPORATION

ONE CONSTITUTION PLAZA  
THIRD FLOOR  
BOSTON, MA 02129  
TEL: (617) 241 3000  
FAX: (617) 241 5115



ADAM A. LARSON  
(617) 241-3036  
alarson@campbell-trial-lawyers.com

August 30, 2006

**VIA FACSIMILE AND REGULAR MAIL**

Joseph M. Mahaney, Esq.  
Goguen, McLaughlin, Richards & Mahaney, P.C.  
The Harrier Beecher Stowe House  
2 Pleasant Street  
South Natick, MA 01760

**Re: Steven McDermott et.al. v. FedEx Ground et.al.**  
**U.S.D.C. District of Massachusetts C.A. No.: 04-CV-12253**

Dear Joe:

I am in receipt of your letters of August 22, 2006 and August 25, 2006. As you may recall, you gave FedEx and Mr. Pruitt through September 30, 2006 to respond and/or otherwise object to the plaintiffs interrogatories and request for production of documents that were served on them in late July. We are currently working on the responses and will try and provide you with the responses prior to that date. Nonetheless, if we cannot, we will provide them to you at the latest by September 30th as we agreed upon. We are checking with Mr. Pruitt to try and schedule his deposition at our offices for Thursday, October 5, 2006 at 9:30 a.m. Please confirm if that works for you. The discovery deadline is now November 15th and this should provide you with time to conduct other discovery if necessary.

In addition, I am writing to you about the outstanding discovery that you owe us. We served discovery to Stacey McDermott in late April and have not received responses yet. We are scheduled to depose her on Thursday, September 7th and need the responses in advance of her deposition. Please provide them to us by this Friday, September 1st. In addition, FedEx served Mr. McDermott with a second set of document requests back on July 13, 2006. I would be willing to grant you an extension through September 30th to respond to those requests. If we do not receive them by that date, we will file a motion to compel.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Adam A. Larson", written over a horizontal line.

Adam A. Larson

AAL:sct

cc: Michael R. Brown, Esq.

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO 0971  
RECIPIENT ADDRESS 915086511128#3244  
DESTINATION ID  
ST. TIME 08/30 15:58  
TIME USE 00'23  
PAGES SENT 2  
RESULT OK

**CAMPBELL CAMPBELL EDWARDS & CONROY  
PROFESSIONAL CORPORATION**

**TEL: 617-241-3000**

**FAX: 617-241-5115**

**FACSIMILE COVER SHEET**

**DATE: August 30, 2006**

**TO: Joseph M. Mahaney, Esq.**

**FAX NO.: (508) 651-1128**

**FROM: Adam A. Larson, Esq.**

**CASE NO.: 1322-16**

**RE: Steven McDermott vs. FedEx Ground and Mr. Pruitt**

**PAGES: \_2\_ (including cover sheet)**

---

**COMMENTS:**

**Hi Joe: Please see the attached correspondence in the above-referenced matter.  
Thanks, Adam.**

---

**THIS TELECOPY IS SUBJECT TO THE ATTORNEY-CLIENT PRIVILEGE  
AND CONTAINS CONFIDENTIAL INFORMATION FOR THE PERSON(S)  
NAMED ABOVE. ANY DISTRIBUTION, COPYING OR DISCLOSURE IS  
STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TELECOPY IN  
ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY BY TELEPHONE  
AT THE ABOVE TELEPHONE NUMBER.**